

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:** § **CASE No. 20-50805-rbk**  
**KRISJENN RANCH, LLC** §  
§ **CHAPTER 11**  
§ **(Jointly Administered)**  
**DEBTOR.** §

**KRISJENN RANCH, LLC, ET AL.** §  
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**PLAINTIFFS,** §  
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**vs.** §  
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**DMA PROPERTIES, INC. ET AL.** §  
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**DEFENDANTS.** §

**PLAINTIFFS' WITNESS AND EXHIBIT LIST FOR CONTINUED HEARING ON  
MOTION FOR SATISFACTION OF ATTORNEY'S FEES JUDGMENT  
SET FOR WEDNESDAY, AUGUST 6, 2025 AT 10:00 A.M. (CT)  
*(Reference Docket No. 457)***

KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; KrisJenn Ranch, LLC-Series Pipeline ROW (Collectively, “KrisJenn”); and Larry Wright (“Wright”) (together, the “Plaintiffs”) reserves the right to call any or all of the following as witnesses at the above-referenced hearing, including, but not limited to, by affidavit, declaration, or proffer.

1. Any witness called or designated by any other party; and
  2. Any rebuttal or impeachment witnesses, as appropriate.

The Plaintiffs reserves all rights to introduce and/or request judicial notice of any or all of the following exhibits as evidence at the hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto:

No.	Exhibit	Offered	Admitted
P-1	Interim Order Granting in Part and Denying in Part Wright's Motion for Satisfaction of Attorneys' Fees Judgment (Docket No. 473)		
P-2	Transcript of Hearings on July 2, 2025 at 10:00 a.m. (Relates to Docket Nos. 456, 457, 458, and 464)		
P-3	Engagement Letter with Vaquero Energy Holdings, LLC Dated July 2, 2025		
P-4	Signed Order on Motions for Summary Judgment filed on July 22, 2025  Re: <i>Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, L.P.</i> ; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159 <sup>th</sup> Judicial District		
P-5	Motion for Satisfaction of Attorney's Fees Judgment by Recoupment or Setoff (Docket No. 457)		
P-6	Proposed Order Granting Motion for Satisfaction of Attorney's Fees Judgment by Recoupment or Setoff (Docket No. 457-1)		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		
	All exhibits necessary for impeachment and/or rebuttal purposes		
	All exhibits identified by or offered by any other party at the hearing.		

Plaintiffs reserve the right to supplement or amend the proposed exhibits as may be required. Plaintiffs further reserve the right to introduce any impeachment or rebuttal exhibit as may be required. Plaintiffs further reserve the right to call any witness introduced by any other party and to call any impeachment or rebuttal witness as may be required.

Dated: August 1, 2025

Respectfully submitted,

**HAYWARD PLLC**

By: /s/Charlie Shelton  
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*Counsel for KrisJenn Ranch, LLC;  
KrisJenn Ranch, LLC-Series Uvalde  
Ranch; KrisJenn Ranch, LLC-Series  
Pipeline ROW; and Larry Wright*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2025, the foregoing was served via CM/ECF on all parties requesting such service. Additionally, on August 1, 2025, or within one business day thereof, the foregoing was served without exhibits via United States First Class Mail to the parties listed below.

<p>Christopher S. Johns cjohns@cobbjohns.com COBB AND JOHNS 14101 Highway 290 West, Suite 400A Austin, Texas 78737 Telephone: (512) 399-3150 Facsimile: (512) 572-8005</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>	<p>Timothy Cleveland tcleveland@clevelandkrist.com Austin Krist akrist@clevelandkrist.com CLEVELAND KRIST PLLC 303 Camp Croft Road, Suite 325 Austin, Texas 78746 Telephone: (512) 689-8698</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>
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<b><i>United States Trustee</i></b>	<b><i>Counsel for Black Duck Properties, LLC</i></b>
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/s/ Charlie Shelton  
Charlie Shelton